

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KLEIMAR, N.V.,

Plaintiff,

against

DALIAN DONGZHAN GROUP CO., LTD.
BENXI BEIYING IRON AND STEEL GROUP
IMPORT AND EXPORT CORP. LTD.,
BEIGANG HONG KONG LIMITED, and
BEITAI IRON & STEEL GROUP CO., LTD.,

Defendants.

X

:

:

:

:

:

:

:

:

:

:

:

:

:

:

:

X

ECF CASE

16 CV 9486 (AJN) (DCF)

**ANSWER OF
GARNISHEE MACSTEEL
INTERNATIONAL
USA CORP. TO FOURTH
SERVED WRIT OF
GARNISHMENT BY
KLEIMAR, N.V.**

TO THE MARSHALL OF THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK:

Pursuant to Rule B(3)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims

of the Federal Rules of Civil Procedure and in response to a certain Process of Maritime

Attachment and Garnishment in the above-captioned matter dated January 9, 2017, and served

upon Garnishee MACSTEEL INTERNATIONAL USA CORP. ("MACSTEEL") on or about

February 13, 2017, Garnishee MACSTEEL hereby states that on such date of service, it was not

indebted to the Defendants DALIAN DONGZHAN GROUP CO., LTD., BENXI BEIYING

IRON AND STEEL GROUP, IMPORT AND EXPORT CORP. LTD., BEIGANG HONG

KONG LIMITED, or BEITAI IRON & STEEL GROUP CO., LTD (collectively, "Defendants"),

and did not otherwise have in its possession any property, tangible or intangible, including funds,

assets, cash, good, chattels, credits, effects, debts, owed by or owed to the Defendant(s) or

monies to be paid to discharge a debt owed to the Defendant(s), including monies being

transferred by, to or for the benefit of the Defendant(s).

Dated: New York, New York
February 27, 2017

DLA PIPER LLP (US)

By: /s/ Neal Kronley
Kiera S. Gans
kiera.gans@dlapiper.com
Neal F. Kronley
neal.kronley@dlapiper.com
1251 Avenue of the Americas
New York, New York 10020
(212) 335-4500 (phone)
(212) 335-4501 (fax)

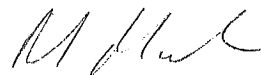
*Attorneys for Garnishee
Macsteel International USA Corp.*

VERIFICATION

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Margo Rosner Marks, being duly sworn, deposes and says as follows:

I am the Managing Director for Macsteel International USA Corp. ("Macsteel"). I have reviewed the contents of the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO FOURTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. in Docket No. 16 Civ. 09486(AJN) and know the contents thereof and that the same are true to Macsteel's files, and communications with relevant employees of the company.



Margo Rosner Marks

Sworn to before me on
February 24, 2017



Notary Public



CERTIFICATE OF SERVICE

I, Neal Kronley, hereby certify that on the 27th day of February, 2017, I caused the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO FOURTH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. to be served by ECF and email upon:

Kevin J. Lennon, Esq.
LENNON, MURPHY & PHILLIPS, LLC
420 Lexington Avenue, Suite 300
New York, New York 10170
(212) 490-6050
(212) 490-6070
klennon@lmpaw.net
Counsel for Plaintiff

/s/ Neal Kronley

Neal F. Kronley